

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

**PAUL GARRETT, Individually and on
Behalf of all Others Similarly Situated**

PLAINTIFF

vs.

No. 3:22-cv-1853-E

RON'S TOWING, INC.

DEFENDANT

JOINT MOTION TO EXTEND MEDIATION DEADLINE

Plaintiff Paul Garrett ("Plaintiff"), individually and on behalf of all others similarly situated, and Defendant Ron's Towing, Inc. ("Defendant"), by and through their undersigned counsel, submit the following Joint Motion to Extend Mediation Deadline:

1. Pursuant to the Court's Mediation Order (ECF No. 26), the Parties were to mediate this case by September 29, 2023.
2. Due to the availability of the Parties and their counsel, the Parties have been unable to schedule and participate in a mediation prior to the mediation deadline.
3. The Parties through their counsel have worked together in trying to schedule the mediation, and they have confirmed their availability to

participate in a mediation on November 8, 2023, which was one of the available dates previously provided by the Mediator. The Parties have requested that the Mediator reserve the date for their mediation but are awaiting confirmation that the date is still available.

4. The Parties respectfully request that the mediation deadline be extended to November 30, 2023.

5. The Parties will participate in mediation in good faith as required by the Court and with the previously selected Mediator.

6. This request is made in good faith and not for the purpose of delay. This extension should not interfere with the other deadlines in this case.

WHEREFORE, premises considered, the Parties respectfully request an order of this Court granting the Joint Motion to Extend the Mediation Deadline, and for such other relief as may be just and proper.

Respectfully submitted,

**PAUL GARRETT, Individually
and on behalf of All Others
Similarly Situated, PLAINTIFF**

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been electronically filed with the Clerk of Court on this date by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants, including:

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